

November 2, 2005

Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Room TW B-204
Washington, D.C. 20554

RE: *Ex Parte*, WC Docket Nos. 04-36, 05-196

Dear Chairman Martin:

On behalf of the Alliance for Telecommunications Solutions' (ATIS) Emergency Service Interconnection Forum (ESIF), ATIS hereby asks the Federal Communications Commission (Commission) to quickly approve the North American Numbering Council's (NANC) recommendations regarding the establishment of an Interim pseudo-Automatic Number Identification (pANI) Routing Number Authority (RNA) and the associated interim guidelines. The RNA is the single designated entity with the responsibility and authority to distribute ranges of numbers to network operators for the purposes of call routing and query steering – the entity with the responsibility and authority to administer pANIs. The RNA will facilitate Voice over Internet Protocol (VoIP) deployments and help conserve both dialable and non-dialable numbering resources.

For over two years, ESIF Subcommittee H has been addressing the need for a pANI administrator, and pANI guidelines, due to a widely-shared belief among industry stakeholders that a formally recognized centralized administrative authority is necessary. The urgency for establishing such an authority and adopting pANI guidelines has significantly increased since the release of the Commission's Order requiring interconnected VoIP service providers to offer E9-1-1 service. The absence of an Interim RNA is negatively affecting all companies attempting to deploy VoIP E9-1-1 solutions and is potentially affecting public safety.

On July 25, 2005, ESIF submitted to the industry and the NANC a document entitled "Routing Number Authority (RNA) for pANIs Used for Routing Emergency Calls – pANI Assignment Guidelines and Procedures." On August 5, 2005, the NANC's Future of Numbering Working Group established the pANI Issue Management Group (IMG) to address the request by ESIF and provide a recommendation to the NANC. With the help of numerous industry experts, the IMG took the ESIF draft guidelines and further refined

them into “pANI Interim Assignment Guidelines for ESQK,” a set of actionable guidelines for a temporary administrator for these VoIP-specific routing numbers (ESQKs).

On September 8, 2005, the NANC submitted these recommendations to the Chief of the Wireline Competition Bureau for approval. Included in this submission was a timeframe indicating that pANI administration for VoIP needed to commence by October 3, 2005, in order for all involved parties to meet the Commission’s November 28, 2005, deadline for VoIP E9-1-1 solutions. However, as of the date of this letter, the Interim Routing Number Authority has not been established.

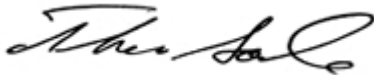
ESIF’s concerns in this matter are two-fold:

- In the absence of a centralized pANI administrator and guidelines, VoIP Service Providers (VSPs) and other parties developing VoIP E9-1-1 solutions may not be able to meet the November 28, 2005, deadline for E9-1-1 service. This is contrary to ESIF’s mission to advance emergency communications technology, and does not serve the public interest. In a significant part of the U.S., there is no mechanism for pANI administration. Without this administration, a VSP would need to use dialable numbers, an ineffective solution. Further, a VSP may not have access to these numbers on a nationwide basis, which could lead to additional delays in meeting the Commission’s November 28, 2005, deadline.
- The lack of an Interim RNA has already led to the use of dialable numbering resources. Use of dialable numbers as pANIs creates significant issues for the providers and the public safety community. Future conversion from dialable to non-dialable numbers will create significant re-work and risks at multiple levels of 9-1-1 service delivery. Further, as the Commission is well aware, numbering resources – both dialable and non-dialable – need cohesive administration to avoid exhaustion.

ESIF respectfully asks the Commission to approve the guidelines as submitted by the NANC (and endorsed by ESIF). ESIF recognizes that, even if the Commission were to approve the NANC recommendations quickly, a number of requests for extension of the November 28, 2005, deadline likely will still be filed. However, a delay in Commission action would likely further frustrate the implementation of VoIP E-9-1-1 solutions. The anticipated Interim RNA has indicated that it will need 30 days after the Commission’s decision to begin pANI allocation. Further, based on feedback from VSPs and VoIP Positioning Center companies, the deployment and testing of these ESQKs will take another 60 to 90 days.

In accordance with Commission Rule 1.49(f), this letter is being filed electronically via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced proceedings, pursuant to Commission Rule 1.1206(b)(2).

Sincerely,



Tom Goode
Associate General Counsel
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 434-8830

cc: Thomas Navin, Wireline Competition Bureau, Chief, (thomas.navin@fcc.gov)
Julie Veach, Wireline Competition Bureau, Deputy Chief, (julie.veach@fcc.gov)
Robert C. Atkinson, NANC Chairman, (rca53@columbia.edu)
Maureen Napolitano, ESIF Chair, (maureen.a.napolitano@verizon.com)